4 1 2 3 4 5 6 IN THE UNITED STATES DISTRICUT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON 8 **SEATTLE DIVISION** 9 NATIONAL UNION FIRE INSURANCE IN ADMIRALTY 10 COMPANY OF PITTSBURGH, PA, ROYAL & 11 CASE NO.: 2:21-cv-01670-RSM SUN ALLIANCE INSURANCE COMPANY OF CANADA, STATE NATIONAL 12 STIPULATION AND ORDER SETTING INSURANCE COMPANY, LIBERTY 13 **DEADLINE FOR CERTAIN** MUTUAL INSURANCE COMPANY, ACE DEFENDANTS TO ANSWER AMERICAN INSURANCE COMPANY. 14 PLAINTIFFS' AMENDED COMPLAINT SOVEREIGN GENERAL INSURANCE 15 COMPANY, ARCH INSURANCE (UK) LIMITED, AND CERTAIN UNDERWRITERS 16 NOTE ON MOTION CALENDAR: AT LLOYD'S OF LONDON SUBSCRIBING 17 TO POLICY NO.'S ENSAM1900387, February 4, 2022 ENSAM1900206, ENSAM1900393, and 18 ENSAM1900398, as subrogees of Petrogas 19 Energy Corp. and its related entities, and PETROGAS ENERGY CORP. 20 Plaintiffs, 21 22 M/T LEVANT, in rem; AVANCE LEVANT, 23 LTD c/o AVANCE GAS, LTD, EXMAR SHIP 24 MANAGEMENT NV, M/T LINDSEY FOSS, in rem, M/T GARTH FOSS, in rem, and FOSS 25 MARITIME CO. 26 Defendants. 27 28

STIPULATION AND ORDER SETTING DEADLINE FOR CERTAIN DEFENDANTS TO ANSWER PLAINTIFF'S AMENDED COMPLAINT - 1 CASE NO.: 2:21-ev-01670-RSM COME NOW, Plaintiffs, National Union Fire Insurance Company of Pittsburgh, Pa, Royal & Sun Alliance Insurance Company of Canada, State National Insurance Company, Liberty Mutual Insurance Company, Ace American Insurance Company, Sovereign General Insurance Company, Arch Insurance (UK) Limited, and Certain Underwriters at Lloyd's of London Subscribing to Policy No.'s ENSAM1900387, ENSAM1900206, ENSAM1900393, and ENSAM1900398, as subrogees of Petrogas Energy Corp. and its related entities (collectively referred to as "Insurers") and Petrogas Energy Corp. ("Petrogas") (Insurers and Petrogas are collectively referred to as "Plaintiffs"), and Defendants, M/T LEVANT, in rem, Avance Levant, LTD c/o Avance Gas LTD, and Exmar Ship Management NV (collectively, "Defendants"), by and through their undersigned counsel and hereby stipulate and agree to a deadline of April 12, 2022 for Defendants to Answer Plaintiffs' First Amended Complaint [ECF Doc. No. 3].

Plaintiffs sent a request to Defendants to waive service on December 17, 2021. Defendants are foreign entities. Rule 4 states that a defendant located outside of any judicial district of the United States has 90 days to serve an answer after a request to waive service is made. The parties are stipulating to extend the answer deadline provided in Rule 4 to give Defendants additional time to work with local counsel to prepare and file an answer.

Submitted this 4th day of February, 2022.

## DENENBERG TUFFLEY, PLLC

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LTD, and Exmar Ship Management NV

STIPULATION AND ORDER SETTING
DEADLINE FOR CERTAIN DEFENDANTS TO
ANSWER PLAINTIFF'S AMENDED COMPLAINT - 2

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SO ORDERED, 1 DATED this 10<sup>th</sup> day of February, 2022. 2 3 4 5 RICARDO S. MARTINEZ 6 CHIEF UNITED STATES DISTRICT JUDGE 7 Presented by: 8 9 **DENENBERG TUFFLEY, PLLC** 10 s/David R. Denton David R. Denton (WA Bar No. 52479) 11 1900 Avenue of the Stars, Suite 300 12 Los Angeles, CA 90067 T: 310.356.4683 13 F: 310.284.9089 ddenton@dt-law.com 14 Attorneys for Plaintiffs 15 LAW OFFICE OF JAMES R. VAUGHAN, P.C. 16 s/Adil Siddiki 17 Adil A. Siddiki (WA Bar No. 37492 18 Phone: 206.935.8077 ext 4539 Toll Free: 1.866.833.9411 19 Fax: 206.935.8184 1416 NW 46th St., Ste 105-436 20 Seattle, WA 98107 21 adil@recoveryatty.com Attorneys for Plaintiffs 22 NICOLL BLACK & FEIG, PLLC 23 24 /s/ Christopher W. Nicoll Christopher W. Nicoll, WSBA No. 20771 25 1325 4<sup>th</sup> Ave, Suite 1650 Seattle, WA 98101 26 206-838-7555 27 cnicoll@nicollblack.com Attorneys for Defendants M/T LEVANT, in rem, 28 Avance Levant, LTD c/o Avance Gas LTD, and Exmar Ship Management NV STIPULATION AND ORDER SETTING DEADLINE FOR CERTAIN DEFENDANTS TO ANSWER PLAINTIFF'S AMENDED COMPLAINT - 3

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